

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC
COUNTY JUDGES AND COUNTY
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**JOINT MOTION TO ENTER THE DISCOVERY ORDER
AND SUPPLEMENTAL PROTECTIVE ORDER**

The United States and Defendants jointly move that the Court enter the accompanying Discovery Order and Supplemental Protective Order. The proposed order sets forth procedures necessary to facilitate the disclosure and comparison of certain information from databases and records maintained by Defendants and by the United States. These procedures are also necessary to provide additional protections governing use, access, storage, and destruction of the relevant data and data comparisons. All parties in these consolidated cases, with the exception of the *Veasey* plaintiffs and *Texas Association of County Judges and County Commissioners* plaintiff-intervenors, consent to this motion.

As will be explained more fully in the United States' forthcoming Motion to Modify the Scheduling Order, the Discovery Order and Supplemental Protective Order, if entered, would permit the disclosure of data after May 2, 2014, the deadline for fact discovery under the Scheduling Order (ECF No. 86). The United States' Motion to Modify the Scheduling Order will seek an adjustment of the fact discovery deadline, among other deadlines, to provide sufficient time for the complex and time-consuming process of comparing the state and federal databases at issue.

This protective order is justified by Rule 26(c) of the Federal Rules of Civil Procedure and relevant case law and is necessary in order for the parties to obtain relevant discovery. The United States and Defendants, therefore, respectfully request that the attached Discovery Order and Supplemental Protective Order be entered by the Court.

Date: February 11, 2014

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CERTIFICATE OF CONFERRAL

Pursuant to Local Rule 7.1(D)(1), I hereby aver that on February 10, 2014, I met and conferred with counsel for the Veasey Plaintiffs and counsel for the Texas Association of Hispanic County Judges and County Commissioners Plaintiff-Intervenors in an effort to reach consent regarding this request. Counsel cannot agree about the disposition of the instant motion.

/s/ Jennifer L. Maranzano

Jennifer L. Maranzano

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CERTIFICATE OF SERVICE

I hereby certify that on February 11, 2014, I served a true and correct copy of the foregoing via the Court's ECF system on the following counsel of record:

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